

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

A.J. and Q.C.,

Plaintiffs,

v.

MASP, LLC,

Defendant.

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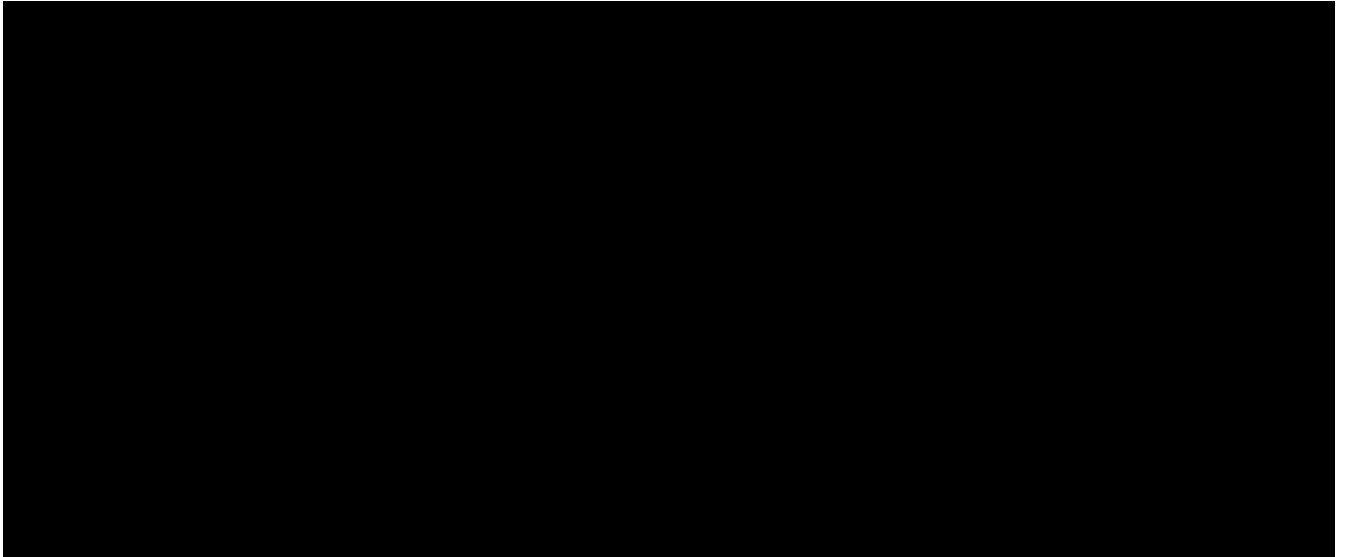
CIVIL ACTION FILE NO.
1:23-cv-04247-JPB

**PLAINTIFF Q.C.'S OBJECTIONS AND RESPONSES TO DEFENDANT
MASP, LLC'S FIRST CONTINUING INTERROGATORIES**

COMES NOW, Plaintiff Q.C., and responds to Defendant MASP, LLC's

First Interrogatories, as follows:

RESPONSES



7.

For the years 2008 to the present, please identify by name and address every health care practitioner (physician, chiropractor, physical therapist, pharmacist, therapist, psychologist, etc.) and every health care facility from whom/which You received any medical care, whether physical or psychological, and for each please identify the date(s) on which You received treatment as well as the nature and purpose of the treatment.

PLAINTIFF'S RESPONSE: Plaintiff objects that this Interrogatory is overly broad, unduly burdensome, not reasonably limited in time or scope and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing, the following is a list of providers who Plaintiff received medical care and treatment from 2008 to the present to the best of her recollection at this time:

I. 2013-Plaintiff states she spoke with someone after she was rescued from the Days Inn Stockbridge. Plaintiff does not recall who she spoke to or which agency this person worked for;

- II. 2010- Atlanta Medical-303 Parkway Drive, N.E., Atlanta, Georgia
30312-Plaintiff was treated for Bells Palsy;**
- III. 2020-Emory University- 550 Peachtree Street, N.E., Atlanta, Georgia
30308-Birth of her daughter, Hannah Sayed; and**
- IV. Current-Dr. Keisha McEwen-Emory Healthcare-550 Peachtree Street,
N.E., Suite 1220, Atlanta, Georgia 30308-Annual Visits.**

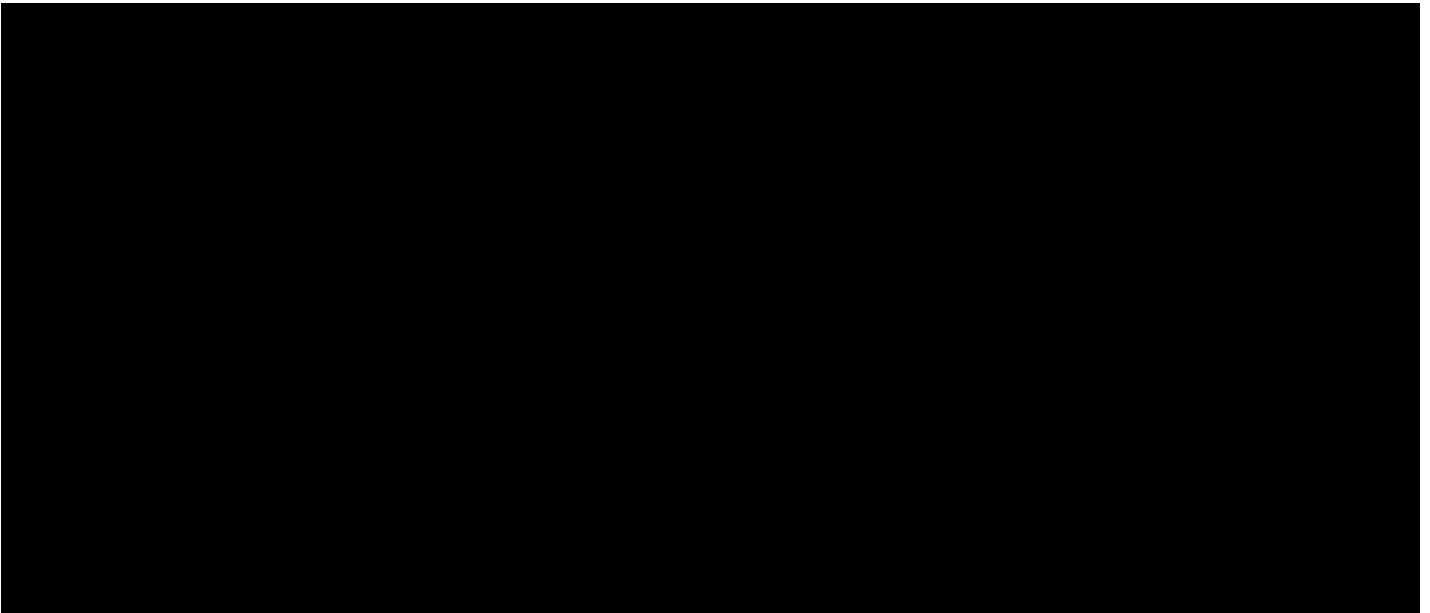
Discovery is ongoing. Plaintiff reserves the right to supplement this response as appropriate during the course of this litigation.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

A.J. and Q.C.,	:	
	:	
Plaintiffs,	:	
	:	CIVIL ACTION FILE NO.
v.	:	1:23-cv-04247-JPB
	:	
MASP, LLC,	:	
	:	
Defendant.	:	
	:	

**PLAINTIFF A.J.'S OBJECTIONS AND RESPONSES TO DEFENDANT
MASP, LLC'S FIRST SET OF CONTINUING INTERROGATORIES**

COMES NOW, Plaintiff A.J., and responds to Defendant MASP, LLC's First
Interrogatories, as follows:





7.

For the years 2008 to the present, please identify by name and address every health care practitioner (physician, chiropractor, physical therapist, pharmacist, therapist, psychologist, etc.) and every health care facility from whom/which You received any medical care, whether physical or psychological, and for each please

identify the date(s) on which You received treatment as well as the nature and purpose of the treatment.

PLAINTIFF'S RESPONSE: Plaintiff objects that this Interrogatory is overly broad, unduly burdensome, not reasonably limited in time or scope and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing, the following is a list of providers who Plaintiff received medical care and treatment from 2008 to the present to the best of her recollection at this time:

- I. Throughout childhood: Dr. Iqbal Amjad- 189C Medical Way, Riverdale, Georgia-Pediatrician.**
- II. 2012 and other various times-Kennestone Hospital- 677 Church Street, N.E., Marietta, Georgia 30060-Plaintiff received treatment here after being trafficked for sex as a minor. Plaintiff further states that whenever she felt sick or in need of medical attention, she sought treatment here.**
- III. 2014- Georgia Baptist Group Home- 505 Water Works Road, Palmetto, Georgia 30268.**

IV. Various times-Piedmont Henry Hospital- 1133 Eagles Landing Parkway, Stockbridge, Georgia 30281- When Plaintiff felt sick or in need of medical attention, she sought treatment here.

V. Various times-Kennestone Cobb- 677 Church Street, Marietta, Georgia 3060- Plaintiff states that if she felt sick or in need of medical attention, she sought treatment here.

VI. January 1, 2021- Perth Amboy, New Jersey- Plaintiff sought treatment at a hospital/medical facility in Perth Amboy, New Jersey because she was not feeling well. Plaintiff does not recall the name of this facility.

VII. Current-Eagles Landing-3333 Jodeco Road, Suite D, McDonough, Georgia 30253- OBGYN.

Discovery is ongoing. Plaintiff reserves the right to supplement this response as appropriate during the course of this litigation.

